

EXHIBIT B.3

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

MARK I. SOKOLOW, et al.,
Plaintiffs,

- vs -

Case No.
04-CV-397 (GBD) (RLE)

PALESTINE LIBERATION
ORGANIZATION, et al.,

Defendants.

DEPOSITION OF PROFESSOR DAVID MILLER

Wednesday, November 20, 2013

9:31 a.m.

Reported by:

Fiona Farson

Ref. No.: 10698

1 butcher it, so I'm just going to ask you.

2 A. It's Strathclyde.

3 Q. Strathclyde; okay.

4 A. S-T-R-A-T-H-C-L-Y-D-E.

5 Q. And what did you teach at Strathclyde?

6 A. Sociology. So introductory sociology. Took master's
7 courses on investigative research; so research methods,
8 the relationship between lobbying and public relations
9 and democracy.

10 There was another course, but I can't remember what
11 it was called.

12 I'm pretty sure I had -- I did an honors course --
13 I can't remember what it was called; it would have been
14 in the same kind of area.

15 I almost started teaching a course on terrorism, but
16 then I didn't.

17 Q. Okay. What do you mean by that?

18 A. Well, I put a course through to be taught, but then
19 I left. So it was on the books, but it was never
20 taught.

21 Q. What did that course involve? Or what would it have
22 involved?

23 A. Well, essentially, it's like -- it's the course I now
24 teach in Bath, which I taught in the spring semester
25 this year. It's now -- I forget what it was called, but

1 A. So -- sorry, what's the question again?

2 Q. You -- if a court qualified one of the experts in this
3 case to testify on the issue of terrorism, you would
4 disagree with that court's decision that that person was
5 an expert?

6 A. I would have --

7 MR. HILL: Same objections.

8 Go ahead.

9 A. I would have to look at the -- the full evidence in the
10 case. I mean, I think -- you know, you can't -- that
11 kind of question is -- is incapable of a proper answer.

12 BY MS. McMILLAN:

13 Q. Okay. And you haven't done that, in preparation for
14 this report; correct?

15 A. I haven't looked at the other cases in which they were
16 qualified as experts, no, I haven't.

17 Q. Okay. So I just want to go through some things that
18 I think that you're not giving an opinion on, and I just
19 want to make sure that I understand that you're not
20 giving an opinion on them.

21 A. Sure.

22 Q. And if you are, please tell me that you are.

23 Okay. Palestinian society and culture?

24 A. I'm not.

25 Q. Palestinian politics?

1 A. I'm not.

2 Q. Palestinian -- PA political parties?

3 A. I'm not.

4 Q. Fatah?

5 A. No.

6 Q. Okay. The PA security forces?

7 A. No.

8 Q. The Al-Aqsa Martyrs' Brigades?

9 A. No.

10 Q. The origins of the Second Intifada?

11 A. No.

12 Q. Israeli general security services?

13 A. No.

14 Q. The Israeli military courts?

15 A. No.

16 Q. The jurisdiction of the Israeli military courts?

17 A. No.

18 Q. What about jurisdiction of Israeli civilian courts?

19 A. No.

20 Q. What about Palestinian courts?

21 A. No.

22 Q. The IDF, Israeli Defense Forces?

23 A. No.

24 Q. The Israeli military ordinances?

25 A. No.

1 Q. International humanitarian law?

2 A. No.

3 Q. Is it fair to say that you're not expert in any of those
4 areas?

5 A. It is fair.

6 Q. Okay.

7 So now, on page 1 of your report, in the second
8 paragraph --

9 A. Yeah.

10 Q. -- you state that you are preparing the report
11 concerning the qualifications, methodology and ultimate
12 conclusions of certain individuals; is that correct?

13 A. Yes.

14 Q. Okay. And then on page 2, it looks like you go
15 through -- there's four bullet points; and it looks like
16 you go through a number of criteria to evaluate
17 qualifications and methodology. Is that correct?

18 A. Yes.

19 Q. In terms of qualifications, you look to whether or
20 not -- we discussed this before, but whether there was
21 a valid source of replicable expertise; correct?

22 A. Yeah.

23 Q. And then in terms of analyzing the methodology, you look
24 at the reliability of the sources; correct?

25 A. Yes.